REMARKS

In the Office Action, claims 25-46 are pending. Claims 25-46 are rejected. In this response, no claims have been amended, cancelled, or added. Thus, claims 25-46 remain pending. Reconsideration of this application, in light of the following remarks, is respectfully requested.

The Examiner rejected claims 25-46 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,613,100 B2 of Miller (hereinafter "Miller") in view of U.S. Patent Publication 2001/0020243 of Koppolu et al. (hereinafter "Koppolu"). The Applicant respectfully disagrees.

Miller describes a graphical user interface that presents a current document along with thumbnail images of documents, relevant to the current document (Miller, Abstract; Column 3, line 63 to Column 4, line 35). The content of each thumbnail, or related document, is predetermined according an "automatic content analysis procedure" (Miller, Column 5, lines 21-38). When a "user desires to access one of these documents, the user selects the appropriate thumbnail 270 via a user-input device (not shown), such as a computer mouse, trackball, etc. Such selection subsequently causes the desired document to be displayed on the display pane" (Miller, Column 4, lines 35-44). The automatic content analysis procedure then automatically loads a new set of thumbnails corresponding to the newly selected document (Miller, Column 7, line 66 to Column 8, line 2).

Koppolu describes an object oriented framework for hyperlink navigation (Koppolu, Abstract; Figure 9). A hyperlink is a reference to another location within a

document or to another documment, which when selected, causes navigation to the target of the hyperlink (Koppolu, paragraph [0286]). Koppolu states that although the presentation of a hyperlink is not subject to a requirement, the hyperlink should preferably be rendered conspicuous "via coloring, underlining, or by changing the cursor or displaying 'tool tips' (i.e., a small descriptive text box) when a mouse cursor passes over the hyperlink" (Koppolu, paragraph [0286]). A tooltip, however, is a tool used in conjunction with graphical objects, such as hyperlinks, where "a small pop-up window with descriptive text, such as a label, for a control or graphic object" (See, e.g., Microsoft Design Network Library, <http://msdn.microsoft. com/library/default.asp?url=/library/en-us/dnwue/html/gloss.asp>, accessed 11/10/06). Thus, the descriptive text is in reference to the hyperlink.

Claim 25 recites:

A method, used in a computer system that includes a user input device coupled to a processor, a display and a memory, for viewing at least one of a plurality of documents, including a document selected as a current document displayed in a first display area of the display, the method comprising:
(a) in response to a first signal from the user input device corresponding to movement of a pointer over a link within the current document displayed in the first display area, displaying in a second display area of the display a representation of content of another document associated by the link to the current document without selecting the other document as the current document and further without displaying the other document in the first display area of the display;
(b) in response to a second signal indicative of a selection of the link within the document currently being displayed from the user input device, the second signal distinguishing from the first signal, selecting the other document as the current document;
(c) displaying the other document as the current document in the first display area of the display; and
(d) repeatedly performing steps (a), (b), and (c), re-using the first and second display areas of the display, to present different documents in the plurality of documents to a user.

As set forth above in Claim 25, a current document is displayed in a first area and another document is displayed in a second display. The second display area displays "a representation of content of another document associated by the link to the current document without selecting the other document as the current document and further without displaying the other document in the first display area of the display." Applicant respectfully submits that Miller and Koppolu, taken alone or in combination, fail to describe or suggest this feature.

The Examiner admitted that Miller fails to disclose "displaying in a second display area of the display a representation of content of another document in response to the movement of a pointer over a link within the current document displayed." The Examiner asserts, however, that Koppolu describes this limitation at Page 30, paragraph 0286. The Applicant respectfully disagrees.

Koppolu describes that in a system that utilizes hyperlinks, the hyperlink "should be made obvious, e.g., via coloring, underlining, or by changing the cursor or displaying "tool tips" (i.e., a small descriptive text box) when a mouse cursor passes over the hyperlink" (Koppolu, page 30, paragraph 0286). As noted above, a tooltip, is a tool used in conjunction hyperlinks, where "a small pop-up window with descriptive text, such as a label, for a control or graphic object" is displayed when a mouse cursor moves over the hyperlink (See, e.g., Microsoft Design Network Library, <http://msdn.microsoft. com /library /default.asp?url=/library/en-us/dnwue/html/gloss.asp>, accessed 11/10/06). Therefore, a tooltip is merely a label for the object/hyperlink.

The Applicants, however, claim "displaying in a second display area of the display a representation of content of another document associated by the link to the

current document without selecting the other document as the current document and further without displaying the other document in the first display area of the display." A small descriptive text box that functions as a label for a hyperlink, however fails to describe displaying "a representation of content of another document" because a small descriptive text box/label fails to describe presenting a representation of <u>content of another document</u> when a cursor moves over a link. Thus, Koppolu also fails to describe or suggest the limitation of claim 25, as discussed above.

For sake of argument, even if Koppolu and Miller provided for each and every limitation as claimed by the Applicants in claim 25, a person of reasonable skill in the art would not be motivated to combine the two references to reach the Applicant's invention. In order to show a motivation to combine Koppolu and Miller, the MPEP recites:

> The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria.

> The initial burden is on the examiner to provide some suggestion of the desirability of doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985).

> (MPEP 2142).

Miller describes an automated content analysis procedure that automatically loads thumbnails related to a document currently being displayed. The content of each thumbnail is essentially a miniature picture of, and a link to, the document it represents. Koppolu describes tooltips displayed in a GUI when a mouse cursor moves over a link, in

order to provide some indication that the object is a hyperlink. The Examiner utilizes Koopolu to show that text boxes could be utilized to display a "representation of content" of another document when a mouse cursor moves over the link. However, Miller is already displaying automatically rendered minuscule representations of documents, which are rendered in a selection panel in a graphical user interface (*See* Miller, Figure 2A and 2B). Thus, the links are already rendered conspicuous to a user, and thus "made obvious" to a user of the graphical user interface (Koppolu, page 30, paragraph [0286]). As such, one skilled in the art would not seek to combine the tool-tip of Kopolu, which makes a hyperlink obvious to a user, with the system of Miller because Miller has already made links obvious, thus rendering the teachings of Koppolu unnecessary. Therefore, the applicants respectfully submit that even if, for sake of argument, Miller and Koppolu described the features of the Applicants invention, as claimed, one skilled in the art would not be motivated to make the proposed combination.

Accordingly, Applicant respectfully submits that the rejection of claim 25 under 35 U.S.C. § 103 has been overcome by the remarks. Since independent claims 32, 39, and 46 contain similar features and limitations to those discussed above, claims 32, 39, and 46 are also not rendered obvious by Miller in view of Koppolu under 35 U.S.C. § 103 for similar reasons. The Applicant respectfully requests withdrawal of the rejection.

Further, dependent claims 26-31, 33-38, and 40-45 depend from claims 25, 32, and 39, and include additional features and limitations. Since claims 25, 32, and 39 were not rendered obvious by Miller in view of Koppolu under 35 U.S.C. § 103, Miller and Koppolu, alone or in combination, also fails to render obvious claims 26-31, 33-38, and 40-45. The Applicant respectfully requests withdrawal of the rejections.

Therefore, Applicant submits that claims 25-46 are in condition for allowance and such action is earnestly solicited.
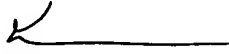
Applicant respectfully submits the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call the undersigned at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: _____

Michael J. Mallie
Attorney for Applicant
Reg. No. 36,591

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026
(408) 720-8300
Fax (408) 720-8383